JAP:RMT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-086

- - - - - - - - - - - - - - - - - - -X

UNITED STATES OF AMERICA

- against -

EDSON ALTINO,

Defendant.

- - - - - - - - - - - - - - - - - - -X

COMPLAINT

(T. 18 U.S.C. §§ 924(c), 2113(d) and 2)

EASTERN DISTRICT OF NEW YORK, SS:

BRADFORD PRICE, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

Upon information and belief, on or about January 25, 2011, within the Eastern District of New York, the defendant EDSON ALTINO did knowingly and intentionally take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, the deposits of which are insured by the Federal Deposit Insurance Corporation, and, in so doing, put in danger the life of a person by the use of a dangerous weapon.

(Title 18, United State Code, Sections 2113(d) and 2)

Upon information and belief, on or about January 25, 2011, within the Eastern District of New York, the defendant

EDSON ALTINO did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit, a violation of 18 U.S.C. § 2113(d).

(Title 18, United State Code, Sections 924(c) and 2)

The source of your deponent's information and the grounds for his belief are as follows:[1]

1. Your deponent has been a Special Agent with the Federal Bureau of Investigation for approximately seven years and assigned to the Joint Bank Robbery Task Force for approximately one month. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bank robbery discussed herein, which includes, but is not limited to, my review of bank robbery surveillance photographs, interviews with witnesses, and conversations with other law enforcement personnel assisting with the investigation.

2. On or about January 25, 2011 at approximately 2:45 p.m., two men robbed a Capital One bank, located at 32-02 Francis Lewis Boulevard, Queens, New York (the "Bank") of approximately $6,600 in United States currency.

3. Witnesses stated that after the men entered the Bank, one approached a teller and demanded money from the "bottom

[1] Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included details of every aspect of this investigation.

drawer." Meanwhile, the other man told the people in the Bank to get on the ground and watched them. As the two men left the Bank after taking the money, one told the people inside that they would be killed if they attempted to follow them. The men were wearing masks over their faces, but witnesses in the Bank stated that they believed the men were black males, because they could see dark skin around their eyes that was not covered by the masks. A witness stated that at least one of the men was armed with a handgun. In addition, surveillance footage from the Bank shows the two men wearing dark-colored, bulky clothing -- possibly jackets or coats with hoods.

4. At approximately 2:45 p.m., an individual (the "Witness") driving past the Bank saw a grey vehicle that she later observed to be an Infinity FX-35 (the "Vehicle") pull out of the Bank's parking lot and run two red traffic lights. The Witness also observed that the Vehicle's license plate was obscured by a plastic bag.

5. The Witness followed the Vehicle, and after a short time, observed the Vehicle stop on 33rd Avenue between 203d Street and 204th Street in Queens, New York. At that time, the Witness observed the defendant EDSON ALTINO climb out of the car, remove the bag over the license plate, get back in the Vehicle and continue driving. The Witness then wrote down the Vehicle's license plate number. Subsequently, the Witness attempted to

continue to follow the Vehicle but ultimately lost sight of it. The Witness then returned to the Bank and provided the above information to law enforcement.

6. Officers and agents then searched certain law enforcement databases for information about the Vehicle and found that a summons had been issued in relation to the Vehicle, and that the summons referred to two addresses, one of which was in Queens. Officers and agents then traveled to that address and at approximately 9:05 p.m., while conducting surveillance in the area, observed the Vehicle driving nearby. Officers and agents subsequently stopped the vehicle, which was being driven by the defendant EDSON ALTINO.

7. Officers and agents presented an array of six photographs to the Witness, who identified the defendant EDSON ALTINO as being the individual whom she saw exit the Vehicle to remove the plastic bag over the Vehicle's license plate after the Vehicle exited the Bank parking lot.

8. The deposits of Capital One are insured by the Federal Deposit Insurance Corporation.

WHEREFORE, your deponent respectfully requests that the defendant EDSON ALTINO be dealt with according to law.

BRADFORD PRICE
Special Agent
Federal Bureau of Investigation

Sworn to before me this
26th day of January, 2011

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK